

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS CARPENTERS CENTRAL )  
COLLECTION AGENCY,et al., )  
Plaintiffs, )  
 ) CIVIL ACTION  
v. ) NO. 04-10157-RCL  
 )  
SANAHART INTERNATIONAL SALES CORP., )  
Defendant. )  
\_\_\_\_\_ )

**AFFIDAVIT OF DAMAGES AND TAXABLE COSTS**

Harry Dow, under penalties of perjury, hereby declares as follows:

1. I am presently the Director of plaintiff Massachusetts Carpenters Central Collection Agency.
2. In that capacity I am responsible for receiving the contributions due to certain employee benefit funds (referred to collectively as “the Funds”) from employers such as defendants that have entered into collective bargaining agreements with local unions of the United Brotherhood of Carpenters & Joiners of America pursuant to which they have agreed to make certain payments to the plaintiff.
3. Defendant Sanahart International Sales Corp. is delinquent in its contributions and payments due plaintiff in the amount of \$9,807.78 through December, 2003.
4. The liquidated damages and interest charges on the amount owed to the Funds by Sanahart International Sales Corp. that are required by the Trust Agreements

pursuant to which they were established and the relevant collective bargaining agreement, computed to December 31, 2003 are \$2,400 and \$2,192.22 respectively.

5. The reasonable attorney's fees for instituting and prosecuting this action that is required by the Trust Agreement and the relevant collective bargaining agreement are \$700.00.

6. The costs incurred by the plaintiff in bringing this action consisting of filing and service fees total \$198.18.

7. The total amount owed to the Massachusetts Carpenters Central Collection Agency by defendants consisting of the separate amounts listed in paragraphs 3 through 6 of this affidavit, totals \$15,298.18.

8. That the defendant is neither an infant and/or an incompetent person, nor in the military services of the United States.

I declare under the penalties of perjury that the foregoing is true and correct this 25<sup>th</sup> day of October, 2004.

/s/ Harry Dow\_\_\_\_\_

Harry Dow, Director

Massachusetts Carpenters Central Collection  
Agency

CERTIFICATE OF SERVICE

I, Christopher N. Souris, hereby certify that I caused a copy of the foregoing to be mailed this date to Sanahart International Sales Corp., 220 Reservoir Street. Ste. 26, Needham, MA 02494.

/s/ Christopher N. Souris\_\_\_\_\_

Christopher N. Souris

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MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, Massachusetts Carpenters Central Collection Agency, et al,  
upon the accompanying Affidavit of Harry Dow, respectfully move pursuant to F.R.C.P.  
55(b)(1), for entry of judgment by the Clerk ordering the defendant, Sanahart  
International Sales Corp. to pay to the plaintiffs the sum of \$15,298.18 in damages and  
taxable costs.

Dated: October 26, 2004

Respectfully submitted,  
Christopher N. Souris  
BBO #556343  
KRAKOW & SOURIS, LLC  
225 Friend Street  
Boston, MA 02114  
(617) 723-8440

/s/ Christopher N. Souris  
Attorney for plaintiffs Massachusetts  
Carpenters Central Collection Agency, et al

CERTIFICATE OF SERVICE

I, Christopher N. Souris, hereby certify that I caused a copy of the foregoing to be mailed this date to Sanahart International Sales Corp., 220 Reservoir Street. Ste. 26, Needham, MA 02494.

/s/ Christopher N. Souris

Christopher N. Souris

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**JUDGMENT**

LINDSAY, D.J.

Defendant Sanahart International Sales Corp. having failed to plead or otherwise defend in this action and default having been entered on September 16, 2004.

Now, upon application of plaintiffs and a declaration demonstrating that defendant owes plaintiffs the sum of \$15,100 that defendant is not an infant or incompetent person or in the military service of the United States, and that plaintiffs have incurred costs in the sum of \$198.18, it is hereby

**ORDERED, ADJUDGED AND DECREED:**

1. That plaintiffs recover from defendant Sanahart International Sales Corp. the sum of \$15,298.18 with interest as provided by law.

By the Court,

\_\_\_\_\_  
Deputy Clerk

Dated: \_\_\_\_\_